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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JUAN GREGORIO FUENTES-LOPEZ,

Petitioner,

v.

ALONDRA CRYSTAL GARCIA,

Respondent.

Case No. 2:24-cv-00890

**Order to Extend
Certain Discovery Deadlines Pursuant
to LR 26-3**

Petitioner, Juan Gregorio Fuentes-Lopez (“Petitioner”), by and through his attorneys, Ford & Friedman, and Respondent, Alondra Crystal Garcia (“Respondent”), by and through her attorneys, Masters Law Group LLC, provide the Court with the following Stipulation and Order to Extend Certain Discovery Deadlines, pursuant to LR 26-3.

(a) Discovery completed

The parties have completed written discovery, responses to written discovery, and depositions of both Petitioner and Respondent.

(b) Discovery that remains to be completed

The parties still require additional time to complete their Joint pretrial order.

(c) Reasons why the deadline was not satisfied or the remaining discovery was not completed within time limits set by the discovery plan

The parties were not able to complete the joint pretrial order by the original deadline of February 10, 2025. The parties' failure to make the request prior to the deadline was result of excusable neglect.

The parties have been diligently engaging in discovery and cooperating to allow for completion of certain discovery past the original deadlines as set forth in the November 5, 2024 Discovery Order [ECF No. 22]. Specifically, for Respondent to identify and obtain an expert and for the parties to agree upon and obtain a joint translator for the numerous Spanish language documents filed in the underlying divorce matter in Mexico.

There was a previous discrepancy on the accuracy of the English translations of the Spanish language documents that were obtained prior to the filing of the instant matter. The parties were working together to identify a court certified Spanish translator. However, after obtaining quotes on the costs of translating the Spanish language documents to English, the parties desire to save on any additional costs. As detailed below, the parties wish to enter an agreement that the English translations that have been disclosed in the instant matter are deemed accurate and can be used at trial.

Further, Respondent had identified an expert prior to the close of discovery for use in the instant matter but had requested additional time in order to obtain a report. Petitioner agreed to several extensions to accommodate this request and in turn required an extension to obtain a rebuttal expert and report, if needed. Respondent has since determined she will be unable to retain her disclosed expert or obtain an expert report

due to financial restrictions. As Respondent will not be obtaining an expert witness, Petitioner no longer requires a rebuttal expert witness.

Therefore, the only remaining discovery item is the filing of the Joint Pretrial Order.

(d) A proposed schedule for completing all remaining discovery

The parties respectfully request that the Court grant an extension through April 7, 2025, for the parties to file their Joint Pretrial Order.

DATED this 17th day of March, 2025.

FORD & FRIEDMAN

/s/ Tony T. Smith

One of Petitioner's Attorneys

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DATED this 15th day of March, 2025.

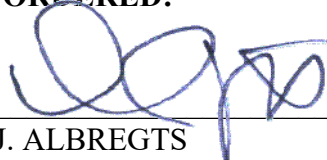
MASTERS LAW GROUP LLC

/s/ Anthony G. Joseph

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IT IS SO ORDERED:



DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

DATED: March 18, 2025